

R E C E I V E D

United States District Court
District of New Jersey

MAY 20 2019

AT 8:30
WILLIAM T. WALSH M
CLERK

) Craig Cunningham
) Plaintiff, Pro-se
)
) v.
)
) Capital Advance Solutions, LLC
)
) Defendants.

CIVIL ACTION NO. 3:17-cv-13050

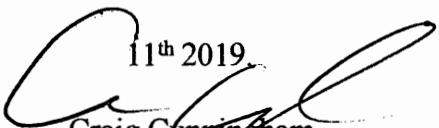
Plaintiff's Motion for a Default Judgment and Request for a hearing to determine damages against Capital Advance Solutions, LLC

1. To the honorable US District Court:

The Plaintiff seeks a default judgment against Capital Advance Solutions, LLC

2. Capital Advance Solutions has already had the clerk's entry of default entered against them as of May 8th 2019, per documents 61 and 62.
3. Accordingly, the Plaintiff seeks a default judgment against Capital Advance Solutions, LLC for the 21 calls alleged in the complaint.
4. The Plaintiff alleges that the calls should be deemed willful and knowing and as such the Plaintiff is entitled to \$1500 per call for violations of 47 USC 227(b) and \$1500 per call for 47 USC 227(c)(5) or \$3,000 per call x 21 calls for \$63,000 in damages plus costs of filing of \$400 and service of \$200 and travel of \$500.
5. The Plaintiff requests a hearing to determine damages per FRCP 55(b)(2). Due to prior scheduling commitments including travel outside the country and a trial scheduled on June 10th, the Plaintiff requests the hearing for damages be after June

11th 2019


Craig Cunningham
Plaintiff, Pro-se 3000 Custer Road ste 270-206 Plano, Tx 75075
5/15/2019

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DALLAS 730
15 MAY '19
PH 34

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FOREVER

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Clerk's Office
Trenton, NJ 08608

08608-150705